

# Submission to National Policy Statement for Freshwater Management

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I am a sheep and beef farmer in the Waikato and a part owner of another sheep and beef farm in the Coromandel and I am concerned that the introduction of economic considerations that will blur the objective formulation of environmental bottom lines in setting out Regional Policies and Plans for the sustainable management of fresh water.

## **In the proposed amendments to the NPS - FM 2014:**

### **1. A. - Water Quality (Page 12) Objective A2 reads:**

*The overall quality of fresh water within a region is freshwater management unit is maintained or improved while:*

- a) protecting the significant values of outstanding freshwater bodies;*
- b) protecting the significant values of wetlands; and*
- c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated;*

*then providing for economic well-being, including productive economic opportunities, within environmental limits.'*

I consider people and communities will make their own efforts at providing for their own economic well-being but if regional councils modify necessary objectives, policies and plans to protect and improve water quality in order to provide for and "balance" that against providing for financial desires and opportunities then the key elements of sustainable management of Section 5 of the RMA are likely to be compromised and undermined.

**I consider the last part - 'then providing for economic well-being, including productive economic opportunities, within environmental limits' should be deleted.**

**2. B. - Water Quantity (Page 15):**

**a) Objective B1 reads:**

*To safeguard the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water, in sustainably managing the taking, using, damming, or diverting of fresh water, while providing for economic well-being, including productive economic opportunities.'*

This reverses the principle in Section 5 of the RMA of enabling people to provide for, amongst other things, their economic well-being but subject to the environmental bottom lines and will inevitably lead to erosion of the bottom lines and conflict between the NPS and the RMA.

**I consider the last part, 'while providing for economic well-being, including productive economic opportunities' should be deleted.**

**b) Objective B3 reads:**

*To improve and maximise the efficient allocation and efficient use of water.*

The objective to maximise the efficient allocation of water will favour those who can make the most money from the water and there will not be provision to consider a fair allocation so that all people have an ability to propose their wishes and needs.

**I consider the objective should refer to equitable allocation and should be modified to read:**

*To improve and maximise the equitable allocation and efficient use of water.*

### **3. CA. - National Objectives Framework**

#### **a) Policy CA2 (f):**

Every regional council is to achieve objective CA1 by applying the processes (a) to (e) in developing freshwater objectives for all freshwater management units. However subclause (f) (iaaab) requires consideration 'at all relevant points' in the processes in (a) to (e) of:

*iaaab. how to provide for economic well-being, including productive economic opportunities, within the context of environmental limits;*

I do not consider this to be useful and once again this is likely to lead to a blurring of the environmental considerations in setting water quality and allocation standards.

**I consider Policy CA2 (f) (iaaab) should be deleted.**

#### **b) Policy CA3**

This policy allows regional councils to allow freshwater objectives for particular FMUs to remain and be set below the national bottom lines in CA3 (b) where:

*any of the existing significant infrastructure (that was operational on 1 August 2014) freshwater quality.; and*

*listed in Appendix*

*setting freshwater objectives below a national bottom line is reasonably ~~the benefits provided~~ by the listed infrastructure; and*

*the freshwater objective applies only to the water body, multiple water bodies or any part of a water body, where the listed infrastructure contributes to the existing water quality.*

And it further states that:

*For the purpose of CA3(b)(i) benefits provided by listed infrastructure means the positive effects of the infrastructure on the well-being of the community and can include, but are not limited to, renewable electricity generation, employment and economic well-being.*

This provides a loophole for ignoring the requirements of the bottom lines in any FMU where the 'significant infrastructure' contributes to the water quality degradation, and the test of 'reasonable necessity' that the benefits provided by the offending infrastructure outweigh the detriments is weak. This will lead to an ongoing undermining of the attempt to improve degraded water quality to even a minimum standard.

The added proviso that the benefits can include *renewable electricity generation, employment and economic well-being* will inevitably leave room for basic standards to be undermined and improvements to be neglected.

**I consider this provision should be deleted or alternatively a much higher threshold introduced with a fixed time limit for the minimum standards to be met.**